

**PLAINTIFF'S COUNSEL'S RESPONSE
TO DEFENDANT STEVENS REQUEST FOR FEES**

EXHIBIT ONE

Bruce Dean's Attorney Hours Submitted

Attorney: Bruce L. Doan

Case Name: Espinosa v. Stevens Tanker Division, LLC

| Date | DESCRIPTION | HRS | TIME VALUE |
|----------|---|-------------|--------------------|
| 11/15/16 | Reviewed Mtn. to Void Consents. | 1.2 | 360.00 |
| 11/17/16 | Reviewed applicable cases supplied by outside counsel on remedies (2.1); updated research for other instances of courts striking opt-in consents or sanctioning counsel for unilaterally contacting potential class members without contacting or involving opposing counsel (3.1). | 5.2 | 1560.00 |
| 11/30/16 | Meet with outside counsel concerning Mtn. to Void Consents. | 2.5 | 750.00 |
| 12/1/16 | Redrafted Summary of the Motion and Relief Sought (4.0); redrafted background facts to place in a chronological chart with columns for whether Class Counsel notified Tanker Division before taking the action with the potential class and the defect in the notice (4.4). | 8.4 | 2520.00 |
| 12/2/16 | Added footnotes in chart that tied Class Counsel's illicit unilateral communications with the timing of opt-ins filing a consent to join class action. | 4.5 | 1350.00 |
| 12/5/16 | Worked on Argument of Mtn. to Strike Consents rewriting it to correspond to the chart in the background facts. | 8.2 | 2460.00 |
| 12/6/16 | Continued rewriting second half of Argument section of Mtn. to Strike. | 6.4 | 1920.00 |
| 12/7/16 | Added text boxes with quotes from controlling cases (3.7); reviewed and revised entire motion (5.4) | 9.1 | 2730.00 |
| 12/8/16 | Sent Mtn. to Strike to outside counsel. | 0.2 | 60.00 |
| 12/16/16 | Reviewed outside counsel's comments on Mtn. to Strike (.3); made changes to Motion (2.3). | 2.6 | 780.00 |
| 12/19/16 | Added additional text boxes to brief with controlling case authority (1.5); send Mtn. to outside counsel (.1) | 1.6 | 480.00 |
| 12/21/16 | Reviewed outside counsel's changes to Mtn. to Strike and respond by email (.8). | 0.8 | 240.00 |
| 1/6/17 | Review outside counsel's additional changes to Mtn. to Strike and make comments | 1.1 | 330.00 |
| | TOTALS | 51.8 | \$16,540.00 |